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Attorneys for Plaintiff  
craigslist, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

craigslist, Inc., a Delaware corporation,

Plaintiff,

v.

Paul Hubert, John Doe d/b/a Craygo.com,  
and Does 3 through 25, inclusive,

Defendants.

Case No. CV 08-05067 JW

**DECLARATION OF NICHOLAS  
MANHEIM IN SUPPORT OF PLAINTIFF  
AND JUDGMENT CREDITOR  
CRAIGSLIST, INC.'S OPPOSITION TO  
DEFENDANT AND JUDGMENT DEBTOR  
PAUL HUBERT'S MOTION TO VACATE  
DEFAULT JUDGMENT**

I, Nicholas A. Manheim, declare as follows:

1. I am an attorney at Perkins Coie LLP, counsel for plaintiff craigslist, Inc. ("craigslist"), and I was one of the attorneys who worked on this lawsuit.

2. The initial complaint in this case was against Defendants John Doe d/b/a craygo.com and Does 2 through 25 for the development, marketing, sale and operation of illegal software via the craygo.com website. Based on third-party discovery, craigslist amended the

1 complaint to name Todd Thompson as a Defendant, because he was identified as the registrant for  
2 the Internet domain craygo.com. craigslist's First Amended Complaint was filed on May 8, 2009.

3 3. On August 21, 2009, I spoke to Mr. Thompson by telephone. He claimed he was  
4 not affiliated with craygo.com or the Craygo software that was the subject of the action. Based  
5 on this discussion, we confirmed Paul Hubert as the likely operator of craygo.com and the Craygo  
6 software, and subsequent investigation revealed that Mr. Hubert was domestic partners with Chad  
7 Conley, who Mr. Thompson confirmed was his step-brother.

9 4. On September 21, 2009, the court entered the order granting leave to file a Second  
10 Amended Complaint to name Paul Hubert as a defendant. The Second Amended Complaint was  
11 filed on September 23, 2009.

12 5. The process server we hired, John Madan, informed our office that Mr. Hubert was  
13 served on September 28, 2009, via substitute service on an individual of suitable age and  
14 discretion residing at Mr. Hubert's dwelling or place of abode.

16 6. On October 5, 2009, I emailed Mr. Hubert at paulhubert21@yahoo.com to alert  
17 him to an upcoming court deadline. As a courtesy, I also attached the summons, civil cover sheet,  
18 Second Amended Complaint, schedule, and other papers related to the action. Attached hereto as  
19 Exhibit A is a true and correct copy of the email I sent Mr. Hubert on October 5, 2009. I have not  
20 included the attachment, which runs 89 pages, but can do so upon request.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3  
4 DATED: September 26, 2011

**PERKINS COIE LLP**

5 By: s/Nicholas A. Manheim  
6 Nicholas A. Manheim  
7 Nmanheim@perkinscoie.com  
8

9 I, Elizabeth L. McDougall, hereby attest, pursuant to N.D. Cal. General Order No. 45, that  
10 the concurrence to the filing of this document has been obtained from each signatory hereto.  
11

12 DATED: September 26, 2011

**PERKINS COIE LLP**

13  
14 By: /s/ Elizabeth McDougall  
15 Elizabeth L. McDougall (WA Bar No.  
16 27026) (pro hac vice)  
EMcDougall@perkinscoie.com

17 Attorneys for Plaintiff  
18 craigslist, Inc.  
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# **EXHIBIT A**

**Manheim, Nicholas A. (Nick) (Perkins Coie)**

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**From:** Manheim, Nicholas A. (Nick) (Perkins Coie)  
**Sent:** Monday, October 05, 2009 1:14 PM  
**To:** 'paulhubert21@yahoo.com'  
**Cc:** McCullagh, James R. (Perkins Coie)  
**Subject:** Craigslist v. Paul Hubert

Mr. Hubert,

As you are no doubt aware, you were served on September 28, 2009 with the attached Second Amended Complaint. If you are represented by counsel, please forward this email to your attorney and inform him or her that we wish to discuss this action. If you are not represented by counsel, please contact us directly.

The first deadline in this matter is Friday, October 9, 2009. As provided in the Court's Order in the attached papers, the parties are responsible for filing a joint case management statement this Friday. If we do not hear from you by Wednesday, October 7, 2009, we will prepare a separate case management statement and inform the Court that we were unable to contact you.

Sincerely,

**Nicholas Manheim | Perkins Coie LLP**  
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PHONE: 206.359.6280  
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